

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

KNACK SYSTEMS, LLC

Plaintiff/Counter-defendant,

v.

TECH DENALI, LLC

Defendant/Counter-plaintiff.

Case No. 3:21-cv-07919

**Via CM/ECF**

Honorable Jessica S. Allen, U.S.M.J.  
District of New Jersey  
Martin Luther King Building and U.S. Courthouse  
Courtroom 2B  
50 Walnut Street  
Newark, New Jersey 07102

February 21, 2023

**Re: Knack Systems, LLC v. TechDenali, LLC**  
**Dkt. No. 21-cv-79219**  
**Joint Letter Regarding Fact Discovery Pursuant to January 11, 2023 Letter Order**

Dear Judge Allen:

Counsel for plaintiff Knack Systems, LLC (“Plaintiff”) and Tech Denali, LLC (“Defendant”) write pursuant to the Court’s January 11, 2023, letter order (ECF No. 52) directing the parties to submit a joint status letter addressing the status of the parties’ completion of fact discovery.

The parties are working to resolve any remaining issues with regard to written discovery, and have deposed a representative from third-party TTI Consumer Power Tools, Inc. (“TTI”) on January 11, 2023. The parties are in the process of scheduling party depositions, and expect to be able to complete those depositions within the next 45 days.

Therefore, the Parties jointly request additional time to complete discovery and propose the following modifications to the existing discovery deadlines:

- Fact discovery deadline: extended from to 3/2/2023 to 4/13/2023;
- Affirmative expert reports: extended from 3/30/2023 to 5/11/2023;
- Responsive expert reports: extended from 4/30/2023 to 6/12/2023; and  
Expert discovery deadline: extended from 5/29/2023 to 7/10/2023.

We look forward to the parties' upcoming telephonic status conference with the Court, currently scheduled for March 2, 2023. Thank you for your Honor's attention to this matter.

Respectfully submitted,

By: /s/ Matthew I. W. Baker

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